

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>UNITED STATES OF AMERICA</b>	§	
	§	
<b>V.</b>	§	<b>CRIMINAL NO. 4:21-cr-293</b>
	§	
<b>ANGELICA GARCIA DUNN</b>	§	
<b>Defendant</b>		

**CRIMINAL INFORMATION**

THE UNITED STATES ATTORNEY CHARGES:

At all times material to this Information:

**COUNTS ONE THROUGH FOUR**  
(Title 18, U.S.C. § 1343)

**A. INTRODUCTION**

1. Angelica Garcia Dunn established and was CEO of AIM Family of Companies which engaged in the business of logistics and transportation, and was located in Katy, Texas.
2. AIM Global Financial, LLC, a division of AIM Family of Companies entered into a contract with BP Products North America Inc. (hereinafter “BP”) to act as an escrow agent to provide third party services making vendor payments to BP’s railcar lessors and repair vendors.

3. Angelica Garcia Dunn, as CEO of AIM Global Financial, LLC, signed the contracts with BP and established bank account xxx6165 at Branch Banking and Trust (BB&T) Bank and account xxx1176 at Hancock Whitney Bank each in the name of AIM Global Financial, LLC to receive the funds from BP which were to be used to pay BP railcar lessors and repair companies. As the sole signatory on these accounts, Angelica Garcia Dunn was responsible for ensuring BP's funds were expended as she contractually agreed.

**B. THE SCHEME**

4. From in or about July 2018 and continuing to on or about September 5, 2019, in the Southern District of Texas and elsewhere, the defendant,

**ANGELICA GARCIA DUNN**

did devise and intend to devise a scheme to defraud, and to obtain money by materially false and fraudulent pretenses, representations, and promises, and to knowingly use and cause to be used interstate wire communications facilities in carrying out the scheme to defraud.

**C. MANNER AND MEANS OF THE SCHEME**

The manner and means of the scheme were as follows:

5. Angelica Garcia Dunn established bank accounts xxx6165 at BB&T Bank account and xxx1176 at Hancock Whitney Bank, each held in the name AIM Global Financial, LLC and over which she had sole signature authority.

6. Angelica Garcia Dunn accepted funds provided by BP into AIM Global Financial, LLC bank accounts xxx6165 and xxx1176 which were to be used to pay invoices from BP vendors.
7. Angelica Garcia Dunn misappropriated some of the funds provided by BP designated for payment to BP vendors by transferring funds to other bank accounts controlled by Garcia Dunn.
8. Angelica Garcia Dunn misappropriated some of the funds provided by BP designated for payment to BP vendors by direct payment of financial obligations of Angelica Garcia Dunn and her businesses.
9. Angelica Garcia Dunn would use subsequent BP deposits of funds to make payments to the BP vendors who had not been paid due to an earlier misappropriation of BP funds.

#### D. ACTS IN FURTHERANCE OF THE SCHEME

In furtherance of the scheme described in paragraphs 1 through 9 and to effect the objects thereof, Angelica Garcia Dunn performed or caused the performance of one or more of the following Acts, among others not described herein, in the Southern District of Texas and elsewhere on or about the following dates:

- (1) July 5, 2018, Angelica Garcia Dunn withdrew \$84,716.94 in funds belonging to BP from AIM Global Financial, LLC account xxx6165 at BB&T Bank and purchased a cashier's check.

(2) August 29, 2018, Angelica Garcia Dunn caused \$53,679.53 in funds belonging to BP to be wire transferred from AIM Global Financial, LLC account xxx6165 at BB&T Bank to Ryder Truck Rental.

(3) October 12, 2018, Angelica Garcia Dunn caused \$157,323.47 in funds belonging to BP to be wire transferred from AIM Global Financial, LLC account xxx6165 at BB&T Bank to her bank account xxx0881 at JPMorgan Chase Bank held in the name AGD Holdings, LLC.

(4) December 28, 2018, Angelica Garcia Dunn caused \$18,071.65 in funds belonging to BP to be wire transferred from AIM Global Financial, LLC account xxx1176 at Hancock Whitney Bank to HRO Resources LLC.

(5) January 7, 2019, Angelica Garcia Dunn caused \$15,196.23 in funds belonging to BP to be wire transferred from AIM Global Financial, LLC account xxx1176 at Hancock Whitney Bank to HRO Resources LLC.

(6) January 24, 2019, Angelica Garcia Dunn caused \$27,393.36 in funds belonging to BP to be wire transferred from AIM Global Financial, LLC account xxx1176 at Hancock Whitney Bank to HRO Resources LLC.

(7) January 24, 2019, Angelica Garcia Dunn caused \$70,000 in funds belonging to BP to be wire transferred from AIM Global Financial, LLC account xxx1176 at Hancock Whitney Bank to JPMorgan Chase Bank account xxx5906 held in the name AIM Global Financial, LLC.

(8) January 25, 2019, Angelica Garcia Dunn caused \$50,000 in funds belonging to BP to be wire transferred from AIM Global Financial, LLC account xxx1176 at Hancock Whitney Bank to Ryder Truck Rental.

(9) January 28, 2019, Angelica Garcia Dunn caused \$70,000 to be transferred from AIM Global Financial, LLC's JPMorgan Chase Bank account xxx5906 to AGD Holdings, LLC's JPMorgan Chase Bank account xxx0881.

(10) January 28, 2019, Angelica Garcia Dunn caused \$20,000 to be transferred from AGD Holdings, LLC's JPMorgan Chase Bank account xxx0881 to Angelica Garcia Dunn's JPMorgan Chase Bank account xxx2006.

(11) January 30, 2019, Angelica Garcia Dunn caused \$14,335.70 in BP funds to be wire transferred from AIM Global Financial, LLC account xxx1176 at Hancock Whitney Bank to People's United Bank, NA.

(12) January 30, 2019, Angelica Garcia Dunn caused \$150,000 in funds belonging to BP to be wire transferred from AIM Global Financial, LLC's Hancock Whitney Bank account xxx1176 to AIM Global Financial, LLC's JPMorgan Chase Bank account xxx5906.

(13) February 1, 2019, Angelica Garcia Dunn caused \$20,814.49 in funds belonging to BP to be wire transferred from AIM Global Financial, LLC's Hancock Whitney Bank account xxx1176 to HRO Resources LLC.

(14) February 8, 2019, Angelica Garcia Dunn caused \$101,438.40 in funds

belonging to BP to be wire transferred from AIM Global Financial, LLC's Hancock Whitney Bank account xxx1176 to Premium Assignment Corp.

(15) February 19, 2019, Angelica Garcia Dunn caused \$7,167.85 in funds belonging to BP to be wire transferred from AIM Global Financial, LLC's Hancock Whitney Bank account xxx1176 to People's United Bank NA.

(16) February 19, 2019, Angelica Garcia Dunn caused \$10,000 in funds belonging to BP to be wire transferred from AIM Global Financial, LLC's Hancock Whitney Bank account xxx1176 to BAM Capital, LLC.

(17) February 19, 2019, Angelica Garcia Dunn caused \$33,235.00 in funds belonging to BP to be wire transferred from AIM Global Financial, LLC's Hancock Whitney Bank account xxx1176 to Ryder Truck Rental.

(18) February 28, 2019, Angelica Garcia Dunn caused \$8,000 to be transferred from AIM Global Financial, LLC's JPMorgan Chase Bank account xxx5906 to AGD Holdings, LLC's JPMorgan Chase Bank account xxx0881.

(19) February 28, 2019, Angelica Garcia Dunn caused \$10,000 to be transferred from AGD Holdings, LLC's JPMorgan Chase Bank account xxx0881 to Angelica Garcia Dunn's JPMorgan Chase Bank account xxx2006.

(20) March 14, 2019, Angelica Garcia Dunn caused \$170,000 in funds belonging to BP to be wire transferred from AIM Global Financial, LLC's Hancock Whitney Bank account xxx1176 to Professional Service Holding Corp.

(21) March 11, 2019, Angelica Garcia Dunn caused \$100,000 in funds belonging to BP to be wire transferred from AIM Global Financial, LLC's Hancock Whitney Bank account xxx1176 to AIM Global Financial, LLC's JPMorgan Chase Bank account xxx5906.

(22) March 13, 2019, Angelica Garcia Dunn caused \$65,000 to be transferred from AIM Global Financial, LLC's JPMorgan Chase Bank account xxx5906 to AGD Holdings, LLC's JPMorgan Chase Bank account xxx0881.

(23) March 13, 2019, Angelica Garcia Dunn caused \$25,000 to be transferred from AGD Holdings, LLC's JPMorgan Chase Bank account xxx0881 to Angelica Garcia Dunn's JPMorgan Chase Bank account xxx2006.

(24) March 18, 2019, Angelica Garcia Dunn caused \$62,000 in funds belonging to BP to be wire transferred from AIM Global Financial, LLC's Hancock Whitney Bank account xxx1176 to AIM Global Financial, LLC's JPMorgan Chase Bank account xxx5906.

(25) March 18, 2019, Angelica Garcia Dunn caused \$88,000 in funds belonging to BP to be wire transferred from AIM Global Financial, LLC's Hancock Whitney Bank account xxx1176 to Ryder Truck Rental.

(26) March 21, 2019, Angelica Garcia Dunn caused \$14,324.45 in funds belonging to BP to be wire transferred from AIM Global Financial, LLC's Hancock Whitney Bank account xxx1176 to HRO Resources LLC.

(27) March 22, 2019, Angelica Garcia Dunn caused \$127,500 in funds belonging to BP to be wire transferred from AIM Global Financial, LLC's Hancock Whitney Bank account xxx1176 to HRO Resources LLC.

(28) March 25, 2019, Angelica Garcia Dunn caused \$22,500 in funds belonging to BP to be wire transferred from AIM Global Financial, LLC's Hancock Whitney Bank account xxx1176 to AIM Global Financial, LLC's JPMorgan Chase Bank account xxx5906.

(29) March 28, 2019, Angelica Garcia Dunn caused \$250,000 in funds belonging to BP to be wire transferred from AIM Global Financial, LLC's Hancock Whitney Bank account xxx1176 to AIM Global Financial, LLC's JPMorgan Chase Bank account xxx5906.

(30) March 28, 2019, Angelica Garcia Dunn caused \$30,000 to be transferred from AIM Global Financial, LLC's JPMorgan Chase Bank account xxx5906 to AGD Holdings, LLC's JPMorgan Chase Bank account xxx0881.

(31) April 2, 2019, Angelica Garcia Dunn caused \$25,000 to be transferred from AGD Holdings, LLC's JPMorgan Chase Bank account xxx0881 to Angelica Garcia Dunn's JPMorgan Chase Bank account xxx2006.

(32) 4/1/2019, Angelica Garcia Dunn caused \$100,000 in funds belonging to BP to be wire transferred from AIM Global Financial, LLC's Hancock Whitney Bank account xxx1176 to AIM Global Financial, LLC's JPMorgan Chase Bank



account xxx5906.

(33) 4/30/2019, Angelica Garcia Dunn caused \$200,000 in funds belonging to BP to be wire transferred from AIM Global Financial, LLC's Hancock Whitney Bank account xxx1176 to AIM Global Financial, LLC's JPMorgan Chase Bank account xxx5906.

(34) June 12, 2019, Angelica Garcia Dunn caused \$100,000 in funds belonging to BP to be wire transferred from AIM Global Financial, LLC's Hancock Whitney Bank account xxx1176 to AIM Global Financial, LLC's JPMorgan Chase Bank account xxx5906.

(35) August 22, 2019, Angelica Garcia Dunn caused \$19,560 in funds belonging to BP to be wire transferred from AIM Global Financial, LLC's Hancock Whitney Bank account xxx1176 to ML Factors Funding, LLC.

(36) September 5, 2019, Angelica Garcia Dunn caused \$23,440.00 in funds belonging to BP to be wire transferred from AIM Global Financial, LLC's Hancock Whitney Bank account xxx1176 to AGD Holding LLC's Hancock Whitney Bank account XXX3727.

E. THE EXECUTION OF THE SCHEME

10. On or about the dates listed below, in the Southern District of Texas and elsewhere, for the purpose of executing the above-described scheme to defraud and

to obtain money by materially false and fraudulent pretenses, representations, and promises, and attempting to do so, the defendant,

ANGELICA GARCIA DUNN,

knowingly caused to be transmitted by means of wire communications in and affecting interstate commerce, the following writings, signals and sounds:

COUNT	DATE	WIRE COMMUNICATION
1	October 12, 2018	Wire transfer of \$157,323.47 from BB&T Bank account xxx6165 to JPMorgan Chase Bank account xxx0881
2	January 30, 2019	Wire transfer of \$150,000 from Hancock Whitney Bank account xxx1176 to Ryder Truck Rental, Inc.
3	March 28, 2019	Wire transfer of \$250,000 from Hancock Whitney Bank account xxx1176 to JPMorgan Chase Bank account xxx5906
4	September 5, 2019	Wire transfer of \$23,440 from Hancock Whitney Bank account xxx1176 to AGD Holding, LLC's Hancock Whitney Bank account xxx3727

All in violation of Title 18, United States Code, Section 1343.

### **NOTICE OF FORFEITURE**

18 U.S.C. §981(a)(1)(C); 28 U.S.C. §2461(c)

Pursuant to Title 18, United States Code, Section 981(a)(1)(C), the United States gives notice to the Defendant Angelica Garcia Dunn that in the event of conviction of an offense charged in Counts 1 and 2 of this Criminal Information the United States will seek forfeiture of all property, real or personal, which constitutes or is derived from proceeds traceable to such offenses.

The property subject to forfeiture is approximately \$2,282,148.53.

**Money Judgment and Substitute Assets**

The United States gives notice that it will seek a money judgment against Defendant Angelica Garcia Dunn. In the event that one or more conditions listed in Title 21, United States Code, Section 853(p) exist, the United States will seek to forfeit any other property of Defendant Angelica Garcia Dunn up to the amount of the money judgment.

JENNIFER B. LOWERY  
ACTING UNITED STATES ATTORNEY

By:



Melissa J. Annis  
Assistant United States Attorney